

CENTURY CENTER IV
2600 CENTURY PARKWAY
ATLANTA, GA 30345

W.R. GRACE & CO. ASBESTOS PROPERTY DAMAGE PROOF OF CLAIM FORM

*The United States Bankruptcy Court for the District of Delaware
In re: W.R. Grace & Co., et al., Debtors, Case No. 01-01139 (JKF)
(Jointly Administered)*

SUBMIT COMPLETED CLAIMS TO:

Claims Processing Agent
Re: W.R. Grace & Co. Bankruptcy
PO Box 1620
Faribault, MN 55021-1620

*The following is a list of the Debtors in this case. Please see "The Debtors" section of the
General Instructions for Completing Proof of Claim Forms. The names in this case are
collectively referred to in this document as "Grace."*

*If you have a current claim against Grace for property damage allegedly resulting from asbestos from a
Grace product, please file this claim with the Claims Administrator. THIS ASBESTOS PROPERTY DAMAGE PROOF
OF CLAIM FORM MUST BE RECEIVED ON OR BEFORE 4:00 P.M. EASTERN TIME ON MARCH 31,
2013, or you will be forever barred from asserting or recovering payment for your claim.*

INSTRUCTIONS FOR FILING THE W.R. GRACE & CO. ASBESTOS PROPERTY DAMAGE PROOF OF CLAIM FORM

WHO SHOULD USE THIS ASBESTOS PROPERTY DAMAGE PROOF OF CLAIM FORM

1. This Asbestos Damage Proof of Claim Form (referred to in this document as the "Form") applies only to current claims made against Grace by or on behalf of parties who are alleging property damage with respect to asbestos in real property owned by the party (such person is referred to in this document as the "claiming party") from a Grace asbestos-containing product or as a result of one of Grace's vermiculite mining, milling, or processing facilities.
2. The Bar Date does not apply to Asbestos Personal Injury Claims, Settled Asbestos Claims or Zonolite Attic Insulation Claims. Those claims will be subject to a separate claim submission process and should not be filed at this time.
3. This form should not be used for Medical Monitoring Claims or Non-Asbestos Claims. Instead, separate specialized proof of claim forms for these claims should be completed.
4. If you are alleging current claims against Grace with respect to asbestos in more than one (1) real property, the claiming party should complete an Asbestos Property Damage Proof of Claim Form for each property. You may request additional forms by calling the Claims Processing Agent at 1-800-432-1909.

GENERAL INSTRUCTIONS

1. This form must be signed by the claimant or authorized agent of the claimant. **THIS FORM MUST BE RECEIVED ON OR BEFORE 4:00 PM EASTERN TIME ON MARCH 31, 2003**, or you forever will be precluded from asserting your claim(s) against or receiving payment from Grace. Return your completed form to the Claims Processing Agent, Re: W.R. Grace & Co. Bankruptcy, P.O. Box 1620, Faribault, MN 55021-1620.
If you are returning this form by mail, allow sufficient time so that this form is received on or before March 31, 2003. Forms that are postmarked before March 31, 2003 but received after March 31, 2003 will not be accepted. Only original forms will be accepted for filing. Forms transmitted by facsimile will not be accepted for filing.
2. If you cannot fit all information in any particular section or page, please make a copy of that page before filling it out and attach as many additional pages as needed.
3. If you are unable to provide any of the information required by the proof of claim form, please so specify, as well as provide a short statement describing why such information is unavailable. If you are in the process of obtaining such information at the time you file your proof of claim, please so advise and indicate that the same shall be provided when obtained.
4. This form must be filled out completely using **BLACK** or **BLUE** ink or may be typewritten.
 - Please print clearly using capital letters only.
 - Do not use a felt tip pen.
 - Skip a box between words.
 - Do not bend or fold the pages of the form.
 - Do not write outside of the boxes or blocks.
5. Because this form will be read by a machine, please print characters using the examples below. For optimum accuracy, please print in capital letters and avoid contact with the edge of the character boxes.
6. Mark check boxes with an "X" (example at right). ☒

NAME	HERE
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7. Be accurate and truthful. A Proof of Claim Form is an official court document that may be used as evidence in any legal proceeding regarding your claim. The penalty for presenting a fraudulent claim is a fine of up to \$500,000 or imprisonment for up to five years or both. 18 U.S.C. §§ 152 & 3571.
8. Make a copy of your completed Form to keep for your records. Send only original Forms to the Claims Processing Agent at the following address: Claims Processing Agent, Re: W.R. Grace & Co. Bankruptcy
PO Box 1620
Faribault, MN 55021-1620.
9. You will receive written notification of the proof of claim number assigned to this claim once it has been processed.

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Zip Code

[illegible]

PART 2: ATTORNEY INFORMATION

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J

[illegible][illegible][illegible]

N	J
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0	7	9	6	2
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Zip Code

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PART 3: PROPERTY INFORMATION

A. Real Property For Which A Claim Is Being Asserted

1. What is the address of the real property for which a claim is being asserted (referred to herein as "the property")?

2600 CENTURY PARKWAY

Street Address

ATLANTA

City

GA

State

30345

Zip Code

(Province) (Postal Code)

UNITED STATES OF AMERICA

Country

2. Are you completing an Asbestos Property Damage Proof of Claim Form for any other real property other than the one listed at "1" above?

☒ Yes ☐ No

3. Do you currently own the property listed in Question 1, above?

☐ Yes ☒ No

4. When did you purchase the property?

02 - 1973

Month Day Year

5. What is the property used for (check all that apply)

☐ Owner occupied residence☐ Residential rental☒ Commercial☐ Industrial Specify:☐ Other Specify:

6. How many floors does the property have?

005

7. What is the approximate square footage of the property?

000109807

8. When was the property built?

☐ Before 1969☒ 1969 - 1973☐ After 1973

9. What is the structural support of the property?

☐ Wood frame☐ Structural concrete☐ Brick☒ Steel beam/girder☐ Other Specify:

10. Have you or has someone on your behalf completed any interior renovations on the property which affected any asbestos on the property?

☒ Yes ☐ No

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A. Real Property For Which A Claim Is Being Asserted (continued)

If yes, please specify the dates and description of such renovations.

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Year

Description **SEE ADDENDUM**

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Year

Description

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Year

Description

11. To the best of your knowledge, have any other interior renovations been completed on the property during any other period of time which affected any asbestos on the property?

☒ Yes ☐ No

If yes, please specify the dates and descriptions of such renovations.

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Year

Description **SEE ADDENDUM**

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Year

Description

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Year

Description

B. Claim Category

12. For which category are you making a claim on the property?

☒ Category 1: Allegation with respect to asbestos from a Grace product in the property

☐ Category 2: Allegation with respect to one of Grace's vermiculite mining, milling or processing operations

If you checked Category 1 in question 12, complete section C.

If you checked Category 2 in question 12, complete section D.

C. Category 1 Claim: Allegation With Respect To Asbestos From A Grace Product In The Property

13. For what alleged asbestos-containing product(s) are you making a claim?

☒ Monokote-3 fireproofing insulation

☐ Other

Specify:

(For a list of the brand names under which Grace manufactured products that may have contained commercially added asbestos, see Exhibit 2 to the Claims Bar Date Notice provided with this Proof of Claim Form.)

14. When did you or someone on your behalf install the asbestos containing product(s) in the property?

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Year

☒ I did not install the product(s)

15. If you or someone on your behalf did not install the asbestos containing product(s), to the best of your knowledge, when was/were the product(s) installed?

1	9	7	2
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Year

☐ Don't know.

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16. Do you have documentation relating to the purchase and/or installation of the product in the property?

☒ Yes ☐ No

If Yes, attach all such documents. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

17. If you do not have any such documents, explain why not and indicate who may have possession or control of such documents with respect to the property.

SEE ADDENDUM

18. When did you first know of the presence of asbestos in the property of the Grace product for which you are making this claim?

1 9 8 6

Year

Please attach all documents relating or referring to the presence of asbestos in the property for which you are making this claim. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

19. How did you first learn of the presence of asbestos in the property of the Grace product for which you are making this claim?

SEE ADDENDUM

20. When did you first learn that the Grace product for which you are making this claim contained asbestos?

1 9 8 6

Year

21. How did you first learn that the Grace product for which you are making the claim contained asbestos?

SEE ADDENDUM

22. Have you or someone on your behalf made an effort to remove, contain and/or abate the Grace product for which you are making this claim?

☒ Yes ☐ No

If Yes, attach all documents relating or referring to such efforts. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

23. If you do not have any such documents, explain why not and indicate who may have possession and control of such documents with respect to the property.

SEE ADDENDUM

24. If you or someone on your behalf did not make an effort to remove, contain and/or abate the Grace product(s) for which you are making a claim, to the best of your knowledge, did anyone else make such an effort?

☒ Yes ☐ No

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25. If you responded Yes to question 22. or 24. and you have not supplied documents, please specify the dates and descriptions of any such efforts.

Description **SEE ADDENDUM**
Year

Description
Year

Description
Year

26. Have you or anyone on your behalf ever conducted any testing or sampling for the presence of asbestos or other particulates in the property?

☒ Yes ☐ No

If Yes, Attach All Documents Related To Any Testing Of The Property

27. If you responded Yes to question 26., but you have not provided documents, indicate who may have possession or control of such testing documents or where such documents may be located.

SEE ADDENDUM

28. If you or someone on your behalf did not conduct any testing or sampling for the presence of asbestos or other particulates on the property, to the best of your knowledge, did anyone else conduct such testing or sampling with respect to the property?

☐ Yes ☐ No **SEE ADDENDUM**

29. If you responded Yes to question 26. or 28. and you have not supplied related documents, please describe when and by whom and the type of testing and/or sampling (e.g. air, bulk and dust sampling).

Company/Individual **SEE ADDENDUM**
Year

Type of testing:

Company/Individual
Year

Type of testing:

Company/Individual
Year

Type of testing:

30. Has the Grace product or products for which you are making this claim ever been modified and/or disturbed?

☒ Yes ☐ No

31. If yes, specify when and in what manner the Grace product or products was modified and/or disturbed?

Description **SEE ADDENDUM**
Year

Description
Year

Description
Year

[illegible][illegible][illegible]

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(Postal Code)

☐ Yes ☐ No

[illegible]

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From:

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 To:

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Year

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From:

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 To:

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Year

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[illegible]

From:					To:				
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Year

[illegible][illegible]

From:

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 To:

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Year

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Year

36. How did you first learn of the presence of asbestos on your property?

Attach all documents relating or referring to the presence of asbestos on the property. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession or control of the document.

If you provide a summary of the documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

37. If you do not have any documents relating or referring to the presence of asbestos on the property, explain why not and indicate who may have possession or control of any such documents with respect to the property.

38. Have you or anyone on your behalf made an effort to remove, contain and/or abate the asbestos on your property?

☐ Yes ☐ No

If Yes, attach all documents relating or referring to such efforts. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession or control of the document.

If you provide a summary of the documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

39. If you do not have any documents relating or referring to the removal, containment and/or abatement of the asbestos on your property, explain why not and indicate who may have possession and control of such documents with respect to the property.

40. If you or someone on your behalf did not make an effort to remove, contain and/or abate the asbestos on your property, to the best of your knowledge, did anyone else make such an effort?

☐ Yes ☐ No

41. If you responded Yes to question 38. or question 40. and you have not supplied related documents, please specify the dates and descriptions of any such efforts.

Year	Description
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Year	Description
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Year	Description
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42. Have you or anyone on your behalf conducted any other testing or sampling for the presence of asbestos on your property?

☐ Yes ☐ No

If Yes, attach all documents relating or referring to such efforts. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession or control of the document.

If you provide a summary of the documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

43. If you do not have any documents relating or referring to any other such testing or sampling for the presence of asbestos on your property, explain why not and indicate who may have possession or control of such documents with respect to the property.

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44. If you or someone on your behalf did not conduct any other testing or sampling for the presence of asbestos on your property, to the best of your knowledge, did anyone else conduct such testing or sampling?

☐ Yes ☐ No

45. If you responded Yes to question 42. or question 44. and you have not supplied related documents, please specify the dates and descriptions of any such efforts.

Year	Description
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Year	Description
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Year	Description
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46. Were you aware of the presence of asbestos on your property when you purchased your property?

☐ Yes ☐ No

47. If you have sold the property, were you aware of the presence of asbestos on your property when you sold your property?

☐ Yes ☐ No ☐ Not Applicable, have not sold the property

A. INTRODUCTION

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

SEE ADDENDUM

- ☐ Yes - lawsuit
- ☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.

If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.

B. LAWSUITS

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

SEE ADDENDUM

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County/State

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Month Day Year

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County/State

Month Day Year

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County/State

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Month Day Year

(Attach additional pages if necessary.)

C. NON-LAWSUITH CLAIMS

1. If the claiming party has made any claims relating to the property for which you are making a claim (including administrative claims) against anyone, that was not filed with a court of law, please provide the following information for each claim:

a. Description of claim:

b. Date submitted:

 - -

Month Day Year

c. Name of entity to whom claim was submitted:

☐ Grace

☐ Other

Name of Entity

a. Description of claim:

b. Date submitted:

 - -

Month Day Year

c. Name of entity to whom claim was submitted:

☐ Grace

☐ Other

Name of Entity

a. Description of claim:

b. Date submitted:

 - -

Month Day Year

c. Name of entity to whom claim was submitted:

☐ Grace

☐ Other

Name of Entity

PART 5: SIGNATURE PAGE

All claims must be signed by the claiming party.

I have reviewed the information submitted on this proof of claim form and all documents submitted in support of my claim. I declare, under penalty of perjury,* that the above statements are true, correct, and not misleading.

CONSENT TO RELEASE OF RECORDS AND INFORMATION: To the extent that I have produced a summary rather than the documents themselves as requested above or indicated who has possession and control of certain documents, I hereby authorize and request that all other parties with custody of any documents or information concerning my property damage or the information contained in this Form, upon the reasonable request of Grace or Grace's representative, with a copy to the claiming party, disclose any and all records to Grace or to Grace's representative.

Ramona L. Lewis, VP-Corporate Counsel
SIGNATURE OF CLAIMANT

03 - 24 - 2003
Month Day Year

*The penalty for presenting a fraudulent claim is a fine up to \$500,000.00 or imprisonment up to 5 years, or both.
18 U.S.C. §§ 152 & 3571.

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RIKER, DANZIG, SCHERER, HYLAND & PERRETTI LLP,
Headquarters Plaza
One Speedwell Avenue
Morristown, New Jersey 07962-1981
(973) 538-0800
Robert J. Gilson (RG 6618)

Attorneys for The Prudential Insurance Company of America

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

W.R. GRACE & CO., et al.,

Debtors.

Chapter 11

Case No. 01-01139 (JKF)
(Jointly Administered)

**ADDENDUM TO PROOF OF CLAIM OF PRUDENTIAL INSURANCE
COMPANY OF AMERICA FOR:**

**CENTURY CENTER IV
2600 CENTURY PARKWAY
ATLANTA, GEORGIA 30345**

VOLUME I OF II

RIKER, DANZIG, SCHERER, HYLAND & PERRETTI LLP,
Headquarters Plaza
One Speedwell Avenue
Morristown, New Jersey 07962-1981
(973) 538-0800
Robert J. Gilson (RG 6618)

Attorneys for The Prudential Insurance Company of America

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

W.R. GRACE & CO., et al.,

Debtors.

Chapter 11

Case No. 01-01139 (JKF)
(Jointly Administered)

**ADDENDUM TO PROOF OF CLAIM
OF PRUDENTIAL INSURANCE
COMPANY OF AMERICA FOR:
2600 CENTURY PARKWAY
(ATLANTA, GEORGIA)**

A. CREDITOR INFORMATION

1. The Prudential Insurance Company of America for itself and various of its subsidiaries and affiliates (collectively "Prudential"), submits this addendum to its proof of claim with respect to its Asbestos Property Damage Claims against the Debtors, pursuant to their voluntary petition for reorganization under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (the "Bankruptcy Code").

2. This addendum relates to the following property:

Century Center IV
2600 Century Parkway
Atlanta, GA 30345

Prudential is concurrently filing proofs of claims for Asbestos Property Damage for seven other properties.

3. Notices to Prudential should be addressed as follows:

Robert J. Gilson, Esq.
Riker, Danzig, Scherer, Hyland & Perretti LLP
Headquarters Plaza
One Speedwell Avenue
Morristown, New Jersey 07962-1981

and

W.H. Ramsay Lewis, Esq.
The Prudential Insurance Company of America
751 Broad Street, 21st Floor
Newark, New Jersey 07102

B. SUPPLEMENTAL RESPONSES

1. The following answers supplement those given on the W.R. Grace & Co. Asbestos Property Damage Proof of Claim Form ("Proof of Claim Form"):

PART 3: PROPERTY INFORMATION

Response to Question No. 10

Interior renovations which may have affected asbestos on the property include, but are not limited to, a limited abatement performed in Suite 450 in 1987.

In addition, this building was the subject of a previous litigation entitled The Prudential Insurance Company of America, et al. v. United States Gypsum Company, et al., as set forth in Part 4 of the Proof of Claim Form. Extensive discovery was conducted in this case. Prudential produced documents relating to its efforts to abate asbestos and all other renovations on the property to W.R. Grace and its counsel, Anthony J. Marchetta, Esq. of the Morristown, New Jersey law firm of Pitney, Hardin, Kipp and Szuch LLP. Therefore, W.R. Grace, or its counsel, is already in possession of any other documents which may be further responsive to this request. In the event that

W.R. Grace is unable to obtain such responsive documentation previously produced to its counsel, to the extent the documents are in Prudential's possession, they will be made available upon reasonable request.

See also Responses to Question Nos. 22, 25, and 31.

Response to Question No. 11

See Responses to Question Nos. 31, 22, 25 and 10.

Response to Question No. 16

Documents relating to the purchase and/or installation of the product in the property include, but are not limited to, the document attached hereto as Exhibit A.

In addition, this building was the subject of a previous litigation entitled The Prudential Insurance Company of America, et al. v. United States Gypsum Company, et al., as set forth in Part 4 of the Proof of Claim Form, in which extensive discovery was conducted. Prudential produced documents relating to the purchase and/or installation of the product in the property to W.R. Grace and its counsel, Anthony J. Marchetta, Esq. of the Morristown, New Jersey law firm of Pitney, Hardin, Kipp and Szuch LLP. Therefore, W.R. Grace, or its counsel, is already in possession of any other documents which may be further responsive to this request. In the event that W.R. Grace is unable to obtain such responsive documentation previously produced to its counsel, to the extent the documents are in Prudential's possession, they will be made available upon reasonable request.

Response to Question No. 17

See Response to Question No. 16.

Responses to Question Nos. 18, 19, 20 and 21

Prudential first became aware of the presence in the property of asbestos-containing fireproofing in approximately April 1986. At that time, it received the results of an asbestos survey report prepared by BCM Converse, Inc. Prudential first learned that the asbestos-containing fireproofing in the property was a Grace product in approximately 1990, when it received the results of constituent analysis performed by Materials Analytical Services, and when it conducted an independent investigation to identify the manufacturer of the asbestos-containing fireproofing found in the property.

Documents responsive to Question Nos. 18, 19, 20 and 21 include, but are not limited to, the documents attached hereto as Exhibit B.

Response to Question Nos. 22, 23 and 25

The documents relating to abatement efforts with respect to this building are too voluminous to provide with this Proof of Claim. Instead, Prudential is attaching as Exhibit C the report of Halliwell Engineering Associates ("Halliwell Report"), which summarizes the abatement efforts in the building and provides the dates such work was performed, as well as a summary of the documents which form the basis of the Halliwell Report.

In addition, this building was the subject of a previous litigation entitled The Prudential Insurance Company of America, et al. v. United States Gypsum Company, et al., as set forth in Part 4 of the Proof of Claim Form, in which extensive

discovery was conducted. Prudential produced documents relating to its efforts to abate asbestos on the property to W.R. Grace and its counsel, Anthony J. Marchetta, Esq. of the Morristown, New Jersey law firm of Pitney, Hardin, Kipp and Szuch LLP. Therefore, W.R. Grace, or its counsel, is already in possession of any other documents which may be further responsive to this request. In the event that W.R. Grace is unable to obtain such responsive documentation previously produced to its counsel, to the extent the documents are in Prudential's possession, they will be made available upon reasonable request.

See also Responses to Question Nos. 10, 25 and 31.

Response to Question Nos. 26, 27, 28 and 29

Documents relating to the testing of materials on the property include, but are not limited to, the constituent analysis performed by Materials Analytical Services, a report on representative sampling of the asbestos-containing fireproofing, a dust sampling report, and a report of William M. Ewing relating to asbestos testing. These documents are attached hereto as Exhibit D.

In addition, this building was the subject of a previous litigation entitled The Prudential Insurance Company of America, et al. v. United States Gypsum Company, et al., as set forth in Part 4 of the Proof of Claim Form, in which extensive discovery was conducted. To the extent that they exist, Prudential produced other documents relating to sampling/testing (i.e. air, dust or bulk sampling) on the property to W.R. Grace and its counsel, Anthony J. Marchetta, Esq. of the Morristown, New Jersey law firm of Pitney, Hardin, Kipp and Szuch LLP. Therefore, W.R. Grace, or its counsel, is already in possession of any other documents which may be further

responsive to this request. In the event that W.R. Grace is unable to obtain such responsive documentation previously produced to its counsel, to the extent the documents are in Prudential's possession, they will be made available upon reasonable request.

Response to Question No. 31

Evidence pertaining to disturbance or modification of asbestos-containing materials in the property include the abatement efforts and renovations as set forth in the Responses to Question Nos. 10, 22, 23 and 25.

In addition, this building was the subject of a previous litigation entitled The Prudential Insurance Company of America, et al. v. United States Gypsum Company, et al., as set forth in Part 4 of the Proof of Claim Form, in which extensive discovery was conducted. Prudential produced documents relating to any disturbance or modification of asbestos-containing materials on the property to W.R. Grace and its counsel, Anthony J. Marchetta, Esq. of the Morristown, New Jersey law firm of Pitney, Hardin, Kipp and Szuch LLP. Therefore, W.R. Grace, or its counsel, is already in possession of any other documents which may be further responsive to this request. In the event that W.R. Grace is unable to obtain such responsive documentation previously produced to its counsel, to the extent the documents are in Prudential's possession, they will be made available upon reasonable request.

PART 4: ASBESTOS LITIGATION AND CLAIMS

Response to Questions A.2 and B.1

This building was the subject of previous litigation, captioned: The Prudential Insurance Company of America, et al. v. United States Gypsum Co.; W.R.Grace & Co.; The Celotex Corporation; United States Mineral Products Co.; Keene Corporation; Asbestospray Corporation, Civil Action No. 87-4277 and The Prudential Insurance Company of America, et al. v. National Gypsum Company, Civil Action No. 87-4328. These cases were filed in the United States District Court for the District of New Jersey.

The Complaint in The Prudential Insurance Company of America, et al. v. United States Gypsum Co., et al. was filed on October 20, 1987. The Complaint in The Prudential Insurance Company of America v. National Gypsum was filed on October 21, 1987. These actions were consolidated on October 17, 1988. On April 13, 1989, Prudential filed its First Amended Complaint and Jury Demand in the consolidated litigation. Copies of the First Amended Complaint, and the face pages of the two earlier Complaints, are attached hereto as Exhibit E.

No lawsuit other than what is set forth above has been brought, but that litigation did include claims of joint and several liability. During the pendency of the above identified action all of the defendants filed for bankruptcy or dissolution. While there are claims pending in several bankruptcy proceedings and there is also a pending appeal, the claim related to the property that is the subject of this Proof of Claim is only being pursued against W.R. Grace & Co.

C. MISCELLANEOUS PROVISIONS

1. **No Waiver of Security or Rights:** In executing and filing this proof of claim, Prudential does not waive any right to security held by it or for its benefit or any other right or rights that Prudential has or may have against Debtors or any other person or persons.

2. **Right to Amend Reserved:** Prudential expressly reserves the right to amend or supplement this proof of claim (including, but not limited to, for purposes of asserting a claim for rejection damages, administrative priority, fixing the amount of damages, fees, costs and expenses referred to herein) at any time and in any respect.


3. **Jurisdiction Only Over Claim:** In filing the within claim, Prudential does not submit itself to the jurisdiction of the Court for any other purpose other than with respect to such claim.

4. **Additional Claims:** This proof of claim is made without prejudice to the filing by Prudential of additional proofs of claim with respect to any other indebtedness or liability of Debtors to Prudential.

3255211.01

EXHIBIT A

3591489.1



SPECIFICATIONS &
RELATED DOCUMENTS
FOR

²⁰⁰⁰
**Century Center
Building Four**

ATLANTA, GEORGIA
PROJECT 72136

→ JULY 25, 1972

Neuhaus+Taylor
ARCHITECTS/PLANNING CONSULTANTS

Chenault & Brady
CONSULTING ENGINEERS

— PIS 00014667 —

Ellisor Engineers, Inc.
STRUCTURAL ENGINEERS

72136

8/31/72

AD1-1

ADDENDUM NO. 1 TO CONTRACT DOCUMENTS

TO: McDevitt & Street Company
General Contractors
2622 Piedmont Road N.E.
Atlanta, Georgia 30324

FROM: Neuhaus and Taylor, A.I.A.
Architects and Planning Consultants
5051 Westheimer, Houston, Texas 77027
Charles E. Burgess
Project Director

JOB NAME: Century Center Building Four

LOCATION: Atlanta, Georgia

OWNER: Gray Properties.
2200 Century Parkway N.E.
Atlanta, Georgia 30345

PROJECT NO: 72136

Acknowledge receipt of the Addendum by inserting its number in the Agreement. This Addendum forms a part of the Contract Documents and insofar as the original Drawings and Specifications are inconsistent, this Addendum governs.

INDEX TO THIS ADDENDUM

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SPECIFICATION	
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SPECIFICATION	
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— PIS 00014668 —

72136

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FINISHES

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- PIS 00014674 -

SECTION 9C7 - SPRAYED PLASTER FIREPROOFING

RELATED DOCUMENTS:

Conditions of the Contract and applicable requirements of Division 1 govern this Section.

Reference Specifications:

Underwriter's Laboratories "Building Materials List", Guide No. 40
3, January 1970 edition.

Underwriter's Laboratories "Building Materials List", Guide No. 40
6, January 1970 edition.

GENERAL:

Follow the manufacturer's printed instructions for the use and installation of his products; except, follow the specifications given herein when these specifications are more restrictive.

Applicator shall be licensed or franchised by the manufacturer to install his products.

Proceed with the work only when conditions are suitable for satisfactory performance of the work.

Fire-Resistance Ratings: Comply with fire-resistance ratings as shown and as required by governing authorities and codes. Provide sprayed plaster fireproofing materials and application procedures which have been tested and listed by the UL for the type of construction shown.

Warranty:

By accepting a Contract, this Contractor agrees to warrant his work for one year against becoming unserviceable or objectionable in appearance as a result of being defective or non-conforming. Without limiting the warranty scope, the work shall be warranted not to:

- Delaminate from the substrate.
- Dust or deteriorate on the surface.
- Lose insulation value.

- P15 00014675

MATERIALS:

Cementitious Mixture shall comply with U.L. "Building Materials List" Guide No. 40 U18.2, January 1970 edition.

Products offered by manufacturers complying with the requirements include the following:

"Zonolite"; W.R. Grace & Company
"Mono-Kote"; Vermiculite Products, Inc.

Fibrous Mixture shall comply with U.L. "Building Materials List", Guide No. 40 U18.3, January 1970 edition.

Products offered by manufacturers complying with the requirements include the following:

"Asbestospray"; Asbestospray Corp.
"Spray Don"; Sprayon Research Corp.

Sealer: When required, the sealer shall comply with the sprayed plaster fireproofing manufacturer's recommendations and shall not change the fire-resistance ratings of the materials.

Delivery: All manufactured materials shall be delivered in original, unopened packages, properly displaying name of manufacturer and Underwriter's Label and appropriate labels for the application specified.

INSTALLATION:

No installations shall be made in freezing weather except under conditions approved by the manufacturer.

Examination of Conditions:

Proceed only when conditions are suitable for satisfactory performance of the work. Supports for ductwork, piping and other mechanical and pumping equipment shall be installed BEFORE fireproofing begins.

Preparation:

Arrange procedures and devices to protect other work from disfigurement and physical damage. This Contractor shall be responsible for damages resulting from his work.

Thoroughly clean dirt, dust, grease, oil and other materials which would prevent good adhesion.

— PIS 00014676 —

MATERIALS:

Cementitious Mixture shall comply with U.L. "Building Materials List" Guide No. 40 U18.2, January 1970 edition.

Products offered by manufacturers complying with the requirements include the following:

- "Zonolite"; W.R. Grace & Company
- "Mono-Kote"; Vermiculite Products, Inc.

Fibrous Mixture shall comply with U.L. "Building Materials List", Guide No. 40 U18.3, January 1970 edition.

Products offered by manufacturers complying with the requirements include the following:

- "Asbestospray"; Asbestospray Corp.
- "Spray Don"; Sprayon Research Corp.

Sealer: When required, the sealer shall comply with the sprayed plaster fireproofing manufacturer's recommendations and shall not change the fire-resistance ratings of the materials.

Delivery: All manufactured materials shall be delivered in original, unopened packages, properly displaying name of manufacturer and Underwriter's Label and appropriate labels for the application specified.

INSTALLATION:

No installations shall be made in freezing weather except under conditions approved by the manufacturer.

Examination of Conditions:

Proceed only when conditions are suitable for satisfactory performance of the work. Supports for ductwork, piping and other mechanical and pumping equipment shall be installed BEFORE fireproofing begins.

Preparation:

Arrange procedures and devices to protect other work from disfigurement and physical damage. This Contractor shall be responsible for damages resulting from his work.

Thoroughly clean dirt, dust, grease, oil and other materials which would prevent good adhesion.

- PIS 00014677 -

MATERIALS:

Cementitious Mixture shall comply with U.L. "Building Materials List" Guide No. 40 U18.2, January 1970 edition.

Products offered by manufacturers complying with the requirements include the following:

"Zonolite"; W.R. Grace & Company
"Mono-Kote"; Vermiculite Products, Inc.

Fibrous Mixture shall comply with U.L. "Building Materials List", Guide No. 40 U18.3, January 1970 edition.

Products offered by manufacturers complying with the requirements include the following:

"Asbestospray"; Asbestospray Corp.
"Spray Don"; Sprayon Research Corp.

Sealer: When required, the sealer shall comply with the sprayed plaster fireproofing manufacturer's recommendations and shall not change the fire-resistance ratings of the materials.

Delivery: All manufactured materials shall be delivered in original, unopened packages, properly displaying name of manufacturer and Underwriter's Label and appropriate labels for the application specified.

INSTALLATION:

No installations shall be made in freezing weather except under conditions approved by the manufacturer.

Examination of Conditions:

Proceed only when conditions are suitable for satisfactory performance of the work. Supports for ductwork, piping and other mechanical and pumping equipment shall be installed BEFORE fireproofing begins.

Preparation:

Arrange procedures and devices to protect other work from disfigurement and physical damage. This Contractor shall be responsible for damages resulting from his work.

Thoroughly clean dirt, dust, grease, oil and other materials which would prevent good adhesion.

- PIS 00014678 -

MATERIALS:

Noncombustible Mixture shall comply with U.L. "Building Materials List" Guide No. 40 U18.2, January 1970 edition.

Products offered by manufacturers complying with the requirements include the following:

"Zonolite"; W.R. Grace & Company
"Mono-Kote"; Vermiculite Products, Inc.

Fibrous Mixture shall comply with U.L. "Building Materials List", Guide No. 40 U18.3, January 1970 edition.

Products offered by manufacturers complying with the requirements include the following:

"Asbestospray"; Asbestospray Corp.
"Spray Don"; Sprayon Research Corp.

Sealer: When required, the sealer shall comply with the sprayed plaster fireproofing manufacturer's recommendations and shall not change the fire-resistance ratings of the materials.

Delivery: All manufactured materials shall be delivered in original unopened packages, properly displaying name of manufacturer and Underwriter's Label and appropriate labels for the application specified.

INSTALLATION:

No installations shall be made in freezing weather except under conditions approved by the manufacturer.

Examination of Conditions:

Proceed only when conditions are suitable for satisfactory performance of the work. Supports for ductwork, piping and other mechanical and pumping equipment shall be installed BEFORE fireproofing begins.

Preparation:

Arrange procedures and devices to protect other work from disfigurement and physical damage. This Contractor shall be responsible for damages resulting from his work.

Thoroughly clean dirt, dust, grease, oil and other materials which would prevent good adhesion.

— PIS 00014679 —

2136

Application to Masonry and Steel:

Wet surfaces to be treated with water. Apply full thickness in one continuous operation. Tamp to required thickness mechanically, or by light spray of water if tamping is required by U.L. Design. Conform to local codes.

Thickness shall be adequate to achieve U.L. rating.

Application in Exposed Areas:

Appearance: Level base coat to provide a desirable finish appearance.

Finish: Colored white with integral coloring; Uniform texture.

Joist Finish: Carry texture finish coat over joists and beams to provide an overall, uniform color and texture.

Clean-Up:

After completion of each day's work, the Contractor shall clean all surfaces, including walls and floors upon which waste fiber has been deposited.

SUBMITTALS:

Submit the following for review, approval or coordination as directed:

Full report(s) of Underwriters' Laboratories, Inc. fire tests including written material and detailed drawings of the tested assembly.

Materials manufacturer's printed instructions for methods and procedures of application.

Bond test data for uncoated, coated and galvanized steel applications.

Return Air Plenums:

When fireproofed, test data shall be submitted to the Architect indicating how the material effectively resists erosion, dusting or flaking due to high velocity air movement.

END OF SECTION 9C7

- PIS 00014680 -

ENTERED

on THE DOCKET 3-26-96
WILLIAM T. WALSH, CLERK
By (Deputy Clerk)

FILED

MAR 23 1996

AT 8:30 M
WILLIAM T. WALSH
CLERK

RIKER, DANZIG, SCHERER, HYLAND & PERRETTI
Headquarters Plaza
One Speedwell Avenue
Morristown, New Jersey 07962-1981
(201) 538-0800

FEDERAL BAR NO. EZ-3452

Attorneys for Plaintiffs,
The Prudential Insurance Company
of America, et al.

THE PRUDENTIAL INSURANCE
COMPANY OF AMERICA, et al.,

Plaintiffs,

vs.

UNITED STATES GYPSUM COMPANY,
et al.,

Defendants.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

CIVIL ACTION

No. 87-4227 (HAA)

No. 87-4238 (HAA)

ORDER ESTABLISHING A FINAL
PRETRIAL SCHEDULE

The parties, through their respective counsel, having appeared before the Court in connection with a pending motion brought by plaintiffs for a separate trial on nine representative buildings and for a status conference; and the parties and the Court having discussed the status of this matter; and for good cause shown:

IT IS on the 22nd day of March, 1996,

ORDERED THAT:

1. Plaintiffs' claims which have been brought or which could be brought in the future against defendants W.R. Grace & Company, United States Gypsum Company, United States Mineral Products Company and Asbestospray Corporation (collectively the "Active Defendants") in this action regarding asbestos-containing materials alleged to be present in the fifteen (15) properties listed below be and hereby are dismissed without cost to any party and with prejudice upon the conditions that such dismissal is without prejudice to any claim related to the properties identified in paragraph 3 of this Order or relating to any persons or entities not currently named as defendants in this matter:

- | | |
|---|---|
| 1. Beverly Hills Hilton
9876 Wilshire Blvd.
Beverly Hills, CA 90209 | 2. Bunker Hill Towers
Condominiums
800 West 1st Street
Los Angeles, CA 90012 |
| 3. Bunker Hill Towers
222 S. Figueroa
Los Angeles, CA 90012 | 4. Emigrant Savings Bank
6 East 43rd Street
New York, NY |
| 5. Executive Plaza
4615-35 Southwest Freeway
Houston, TX 77027 | 6. Houston Natural Gas
Building
1200 Travis Street
Houston, TX 77002 |
| 7. Hyatt Regency
623 Union Street
Nashville, TN 37219 | 8. Lockheed Building
645 Almanor Avenue
Sunnyvale, CA 94086 |
| 9. Midland Center
134 Robert S. Kerr Ave.
Oklahoma City, OK 73102 | 10. Park Towers
1233 & 1333 West
Loop South
Houston, TX 77207 |

- | | |
|---|---|
| 11. Prudential Center
Chicago
One Prudential Plaza
Chicago, IL 60601 | 12. Turtle Bay Hilton
and Country Club
Rural Oahu
Kahuku, Hawaii 96731 |
| 13. Valley Bank Center
201 North Central Avenue
Phoenix, AZ | 14. Westroads Shopping
Center
102 Dodge Street
Omaha, NE |
| 15. 200 Market Street Bldg.
200 Market Street
Portland, OR | |

2. Plaintiffs' claims which have been brought in this action regarding asbestos-containing materials alleged to be present in the five (5) properties listed below are hereby stayed as to this litigation and shall be pursued only through the bankruptcy proceedings of defendants National Gypsum Company, In re National Gypsum Co., No. 390-37213-5AF-11 (Bankr. N.D. Tex. filed Oct. 28, 1990), Celotex Corporation, In re The Celotex Corp., Nos. 90-1001G-8B1 and 90-10017-8B1 (Banker. M.D. Fla. filed Oct. 12, 1990), and Keene Corporation In re Keene Corp., No. 93B46090 (SMB) (Bankr. S.D.N.Y. filed on Dec. 3, 1993), (collectively referred to as "Bankruptcy Proceedings") or any future proceedings or actions allowed by the Bankruptcy Proceedings:

- | | |
|--|---|
| 1. Colony Square
100 Colony Square, NE
Atlanta, GA 30361 | 2. Comerica Building
151 South Rose St.
Kalamazoo, MI 49007 |
| 3. Merabank & Trader Buildings
3003 North Central Ave.
Phoenix, AZ | 4. Todd Towers
888 North Sepulveda
El Segundo, CA 90245 |
| 5. 241 Building
Abbot Road
East Lansing, MI 48823 | |

3. The claims which remain against the Active Defendants involve claims relating to asbestos-containing materials alleged to be present in the eighteen (18) properties listed below:

- | | |
|---|--|
| 1. Brookhollow I
2800 North Loop West
Houston, TX 77092 | 2. Century Center Complex
2200 & 2600 Century
Parkway
Atlanta, GA 30345 |
| 3. Chatham Center
5th Avenue
Crosstown Expressway
Pittsburgh, PA
and
Hyatt Pittsburgh
112 Washington Street
Pittsburgh, PA | 4. Embarcadero Center I
One Embarcadero Center
San Francisco, CA 94100 |
| 6. First Florida Tower
111 Madison Street
Tampa, FL 33602 | 5. Embarcadero Center II
Two Embarcadero Center
San Francisco, CA 94100 |
| 8. Hunt Valley Marriott
I-83 at Shawn Road
Hunt Valley, MD | 7. Five Penn Center
16th & Market Street
Philadelphia, PA 19000 |
| 10. Northwest Financial
Center
7900 Xerxes Ave. South
Bloomington, MN 55431 | 9. Northland Towers Office
Center
Northland Dr. & Greenfield Rd.
Southfield, MI |
| 12. Prudential Plaza Bldg.
(Newark)
745 Broad Street
Newark, NJ 07101 | 11. Prudential Plaza
Denver
1050 17th Street
Denver, CO |
| 14. Short Hills Office
Building
51 John F. Kennedy Parkway
Short Hills, NJ 07078 | 13. Renaissance Tower
1201 Elm Street
Dallas TX 75270 |
| 16. Twin Towers/Gaslight
Tower
235 Peachtree Street, NE
Atlanta, GA 30303 | 15. Southdale Office
Complex
5600 France Avenue
Edina, MN |
| | 17. 130 John Street Bldg.
130 John Street
New York, NY |

18. 1100 Milam Bldg.
1100 Milam
Houston, TX 77002

4. A. For purposes of this case only, defendant W.R. Grace hereby waives its right to contest the issue of product identification related to the following properties, but does not waive and reserves the right to contest the quantity of product in each property:

-Century Center Complex
2200 & 2600 Century Parkway
Atlanta, GA 30345

-Renaissance Tower
1201 Elm Street
Dallas, TX 75270

-Embarcadero Center I
One Embarcadero Center
San Francisco, CA 94100

-Embarcadero Center II
Two Embarcadero Center
San Francisco, CA 94100

B. For purposes of this case only, and in consideration of plaintiffs' dismissal of their claims against United States Gypsum regarding asbestos-containing materials alleged to be present in the Hyatt Regency, Nashville, TN, Bunker Hill Towers, Los Angeles, CA, Emigrant Savings Bank, New York, NY, and Prudential Center, Chicago, IL., defendant United States Gypsum hereby waives and gives up its right to contest the issue of product identification related to the following properties, with, where applicable, the limitations noted in parentheses, but does not waive and reserves its right to contest the quantity of product in each property:

-Chatham Center
5th Avenue
Crosstown Expressway
Pittsburgh, PA
and

-Five Penn Center
16th & Market Street
Philadelphia, PA 19000

Hyatt Pittsburgh
112 Washington Street
Pittsburgh, PA
(As to Floors 1 through
7 Only)

-Prudential Plaza Bldg.
(Newark)
751 Broad Street
Newark, NJ 07101
(As to Mall Only)

-Twin Towers/Gaslight
Tower
235 Peachtree Street, NE
Atlanta, GA 30303
(As to Gaslight Tower Only)

5. All remaining discovery in this action shall be completed as follows:

BUILDING-SPECIFIC DISCOVERY

A. All building-specific discovery has been completed on the following properties, except as noted in Orders entered by the Court in February or March 1996 regarding motions to compel further discovery:

Embarcadero Center I,
Embarcadero Center II,
Brookhollow I,
Five Penn Center,
Chatham Center/Hyatt Pittsburgh,
Prudential Plaza, Newark,
130 John Street,
Hunt Valley Marriott, and
Short Hills Office Building

B. All building-specific discovery on the following properties:

Renaissance Tower
Century Center
First Florida Tower
Northland Towers
Southdale Office Complex
Twin Towers
Northwest Financial Center
Prudential Plaza, Denver
1100 Milam

shall be completed as follows:

- (i) Defendants shall be permitted to serve twenty-five (25) interrogatories, without subparts, regarding each of the above buildings on or before March 30, 1996, except for Renaissance Tower, regarding which no further interrogatories will be permitted.
- (ii) Plaintiffs shall serve objections (for which no answers will be subsequently provided) to the building-specific interrogatories fifteen (15) days after receipt of the interrogatories and plaintiffs shall serve answers forty-five (45) days after receipt of the interrogatories.
- (iii) Defendants shall be permitted to conduct a physical inspection, including air and dust sampling, of the above buildings on or before July 30, 1996, pursuant to a schedule to be worked out by counsel.
- (iv) Documents regarding each of the above buildings shall be made available to defendants at locations for each building to be designated by plaintiffs and defendants shall complete their review of documents and designate documents to be copied on or before April 30, 1996.
- (v) Within five (5) days of the completion of defendants' document review at a building, the documents designated for copying by defendant shall be made available to a mutually selected copying company. The copying company shall mark the documents with PIS numbering to be identified by plaintiffs and shall produce identical sets of the documents to plaintiffs and defendants, with each party

bearing half of the copying costs. Plaintiffs reserve their right to identify inadvertently produced privileged documents by supplying a privileged log thirty (30) days after receipt of the copies of the documents by defendants and plaintiffs.

(vi) Defendant W.R. Grace shall be permitted to take a total of eighty-five (85) depositions and defendant U.S. Gypsum shall be permitted to take a total of fifteen (15) depositions of fact witnesses regarding the above buildings, including Rule 30(b)(6) witnesses. No other depositions will be permitted except by written consent of counsel for plaintiff or by leave of Court for extraordinary circumstances and for good cause shown. The defendants shall identify the witnesses to plaintiff as soon as reasonably possible but no later than June 15, 1996, subject to the disclosure of additional witnesses at depositions taking place after June 15, 1996. As to depositions conducted after September 15, 1996, no informal requests for additional documents at or in connection with depositions will be allowed. All depositions must be completed on or before October 30, 1996, and there will be no extensions.

(vii) Plaintiffs shall be permitted to take a total of fifteen (15) depositions of fact witnesses regarding the above buildings. No other depositions will be permitted except by written consent of counsel for defendant or by leave of Court for extraordinary circumstances and for good cause shown. The depositions must be completed on or before October 30, 1996, and there will be no extensions.

GENERAL LIABILITY DISCOVERY

C. Defendants, jointly, shall be permitted to take a total of eighty (80) additional depositions of fact witnesses, including Rule 30(b)(6) witnesses, regarding general liability issues (even if such issues relate to buildings currently or formerly at issue in the litigation), and plaintiffs shall be permitted to take a total of eighty (80) additional depositions of fact witnesses, including Rule 30(b)(6) witnesses, regarding general liability issues. The parties will be permitted to serve additional third-party document subpoenas which do not involve a deposition. No other depositions will be permitted except by written consent of counsel or by leave of Court for extraordinary circumstances and for good cause shown. All such fact witnesses shall be identified as soon as reasonably possible but no later than July 30, 1996, subject to the disclosure of additional witnesses at depositions taking place after July 30, 1996. As to depositions conducted after September 15, 1996, no informal requests for additional documents at or in connection

with depositions will be allowed. All depositions shall be completed on or before October 30, 1996, and there will be no extensions.

EXPERT DISCOVERY

- D. On or before August 1, 1996, plaintiffs shall identify all proposed experts. Unless agreed to in writing by the relevant parties (which has already been done regarding medical experts), written expert reports (prepared in accordance with Rule 26) shall also be served on or before August 1, 1996.
- E. On or before September 1, 1996, defendants shall identify all proposed experts. Unless agreed to in writing by the relevant parties (which has already been done regarding medical experts), written expert reports (prepared in accordance with Rule 26) shall also be served on or before September 1, 1996.
- F. On or before October 1, 1996, plaintiffs shall have the right to serve expert rebuttal reports as long as those reports are prepared by an expert identified on or before August 1, 1996.

G. All depositions of experts shall be conducted and completed between September 1, 1996 and October 31, 1996.

6. All new dispositive motions or new motions for partial summary judgment must be filed and served on or before October 1, 1996. The Court and the parties shall establish a briefing and hearing schedule after the motions, if any, are filed and served with the goal of having the motions determined so the case is ready for trial by December 1996.

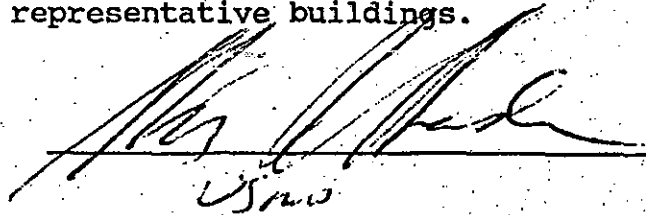
7. The Court shall endeavor to conduct monthly status conferences to assist the parties to resolve any issues which may arise under the terms of this Order.

8. A final Pretrial Order shall be jointly submitted by the parties to the Court on November 29, 1996.

9. A final Pretrial Conference shall be held on December 2, 1996. At that conference, the final Pretrial Order will be entered and a date for a comprehensive trial addressing all issues (including liability and damages) relating to all properties identified in paragraph 3 of this Order shall be set as soon thereafter as the schedule for the Court permits.

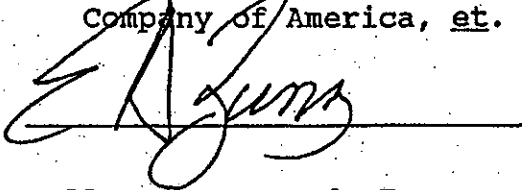
10. There will be no extensions in the schedule established by this Order, except for the most extraordinary circumstances and for good cause shown upon written application and with an opportunity for a hearing.

11. Based on the provisions in this Order, plaintiffs voluntarily withdraw without prejudice their motion for a separate trial on nine representative buildings.

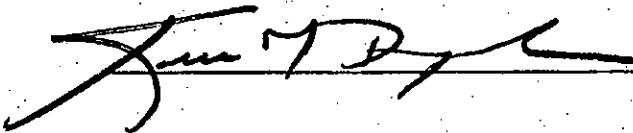
A handwritten signature in black ink, appearing to be "J. J. [unclear]", written over a horizontal line.

CONSENTED TO AS TO PARAGRAPHS 1 THROUGH 4 ONLY:

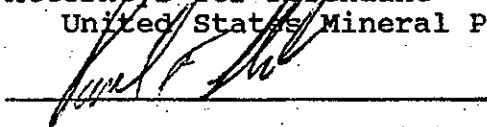
Edward A. Zunz, Jr., Esq.
Riker, Danzig, Scherer, Hyland
& Perretti
One Speedwell Avenue
Morristown NJ 07962
Attorneys for Plaintiffs
The Prudential Insurance
Company of America, et. al.



Kell M. Damsgaard, Esq.
Morgan, Lewis & Bockius
2000 One Logan Square
Philadelphia PA 19103
Attorneys for Defendant
United States Gypsum Company



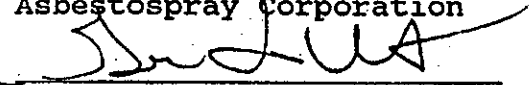
Paul Slater, Esq.
Danaher, Tedford, Lagnese
& Neal
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& Szuch
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Morristown NJ 07962-1945
Attorneys for Defendant
W.R. Grace & Co.



Gregory Wright, Esq.
Stich, Angell, Kreidler,
Brownson & Ballou
The Crossings, Suite 120
250 Second Avenue South
Minneapolis MN 55401-2122
Attorneys for Defendant
Asbestospray Corporation



F:\SSDATA\RG1\PLD\2012371.1

CONSENTED TO AS TO PARAGRAPHS 1 THROUGH 4 (ONLY):

Edward A. Zunz, Jr., Esq.
Riker, Danzig, Scherer, Hyland
& Perretti
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Morristown NJ 07962
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Company of America, et. al.

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& Szuch
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New York NY 10005
Attorneys for Defendant
United States Mineral Products

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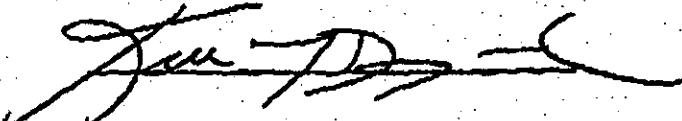
COMMENTED TO AS TO PARAGRAPHS 1 THROUGH 4 ONLY:

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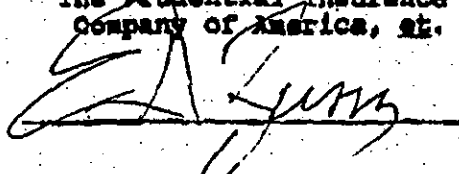
00-10-90 00.40PM FROM FLORHAM PA
SENT BY:RIKER,DANZIG

03-16-86 5:02PM RIKER,DANZIG,SCHERER

201 866 1550:16/16

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FILED IN 10/24/05 10:23:11

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EXHIBIT B

ATTACHMENT I

ASBESTOS SURVEY REPORT

FOR

PRUDENTIAL INSURANCE COMPANY

CENTURY CENTER COMPLEX

BCM PROJECT NO. 05-4151-06

APRIL 28, 1986

BCM CONVERSE INC.
108 ST. ANTHONY STREET
MOBILE, ALABAMA 36602

© 1986 BCM CONVERSE INC.

C-2

July 18, 1986

PIS 00006657

Building 2200VISUAL OBSERVATION

Friable fireproofing was observed on structural steel throughout the building (Floors 1 through 10 and basement). A transite cooling tower was observed on the roof. Pipe lagging and pipe elbows, possibly containing asbestos, were observed in the mechanical rooms on all floors.

BULK SAMPLING RESULTS

<u>SAMPLE NO.</u>	<u>LOCATION</u>	<u>RESULTS</u>
01	4th Floor Ceiling Tile	0%
02	4th Floor - Fireproofing	20%
03	7th Floor Mech Room Pipe Elbow Tape	10%
04	7th Floor - Fireproofing	20%
05	Basement - Elbows on Chillers	50%
06	10th Floor - Fireproofing	6%
07	10th Floor - Fireproofing	5%
08	10th Floor - Fireproofing	7%
09	10th Floor - Elbows in Mech Room - on Hot Water Heater	10%
10	9th Floor - Ceiling Tile	0%
11	9th Floor - Fireproofing	8%
12	9th Floor - Fireproofing	8%
13	9th Floor - Fireproofing	7%
14	8th Floor - Fireproofing	9%
15	8th Floor - Fireproofing	7%

July 18, 1986

BUILDING 2200

(continued)

BULK SAMPLING RESULTS

<u>SAMPLE NO.</u>	<u>LOCATION</u>	<u>RESULTS</u>
16	8th Floor - Fireproofing	7%
17	7th Floor - Fireproofing	6%
18	7th Floor - Fireproofing	8%
19	7th Floor - Fireproofing	10%
20	7th Floor Mech Room Pipe Elbows - Tape	40%
21	6th Floor - Fireproofing	6%
22	6th Floor - Fireproofing	9%
23	6th Floor - Fireproofing	7%
24	5th Floor - Fireproofing	8%
25	5th Floor - Fireproofing	15%
26	5th Floor - Fireproofing	8%
27	5th Mech Room Pipe Elbow - Tape	50%
28	4th Floor - Floor Tile	0%
29	4th Floor - Fireproofing	10%
30	4th Floor - Fireproofing	7%
31	3rd Floor - Fireproofing	6%
32	3rd Floor - Fireproofing	6%
33	3rd Floor - Fireproofing	8%
34	2nd Floor - Fireproofing	10%
35	2nd Floor - Fireproofing	8%
36	2nd Floor - Fireproofing	8%
37	1st Floor - Fireproofing	7%
38	1st Floor - Fireproofing	8%
39	1st Floor - Fireproofing	8%

C-4

July 18, 1986

PIS 00006659

BUILDING 2200

(continued)

BULK SAMPLING RESULTS

<u>SAMPLE NO.</u>	<u>LOCATION</u>	<u>RESULTS</u>
40	Basement - Fireproofing	6%
41	Basement - Fireproofing	6%
42	Basement - Fireproofing	9%
43	Basement - Elbows in Chiller Rm - Water Supply Line	10%
44	Basement - Elbows in Heater Tank Rm	2%

LOCATION OF ASBESTOS MATERIAL

Asbestos materials were confirmed within the following areas of
Building 2200:

<u>AREA</u>	<u>TYPE</u>	<u>LOCATION</u>
Basement, Floors 1-10	Fireproofing	Throughout Floor
Mechanical Rooms	Pipe Elbows	Piping
Roof Level	Transite Panels	Cooling Tower

July 18, 1986

Building 1800VISUAL OBSERVATION

Friable fireproofing was observed on structural steel throughout the building (Floors 1 through 18). Because a previous bulk sample analysis (performed by others and verbally reported to BCM) indicated a negative report, only confirmation bulk sampling was performed. A transite cooling tower was observed at ground level of the building.

BULK SAMPLING RESULTS

<u>SAMPLE NO.</u>	<u>LOCATION</u>	<u>RESULTS</u>
01	Elevator - Penthouse - Fireproofing	0%
02	Elevator - Penthouse - Fireproofing	0%
03	18th Floor - Fireproofing	0%
04	15th Floor - Fireproofing - Conference Rm Suite 1500	0%
05	15th Floor - Fireproofing - Mech Room	0%
06	10th Floor - Fireproofing - Center Core	0%
07	10th Floor - Fireproofing - South East Corner	0%
08	7th floor - Fireproofing - Mech Room	0%
09	Basement - Chillers Elbows	0%
10	Basement - Chillers Elbows	0%

LOCATION OF ASBESTOS MATERIAL

Asbestos materials are present within the transite cooling tower of Building 1800.

July 18, 1986

Building 2600VISUAL OBSERVATION

Friable fireproofing was observed on structural steel throughout the building (Floors 1 through 4) and basement. Other materials observed include a transite cooling tower at ground level and insulated pipe elbows in the chiller building area.

BULK SAMPLING RESULTS

<u>SAMPLE NO.</u>	<u>LOCATION</u>	<u>RESULTS</u>
01	Basement Fireproofing	25%
02	Basement Fireproofing	7%
03	Basement Fireproofing	9%
04	Basement Ceiling Tile	0%
05	1st Floor - Fireproofing	8%
06	1st Floor - Fireproofing	8%
07	1st Floor - Fireproofing	6%
08	1st Floor - Ceiling Tile	0%
09	2nd Floor - Fireproofing	7%
10	2nd Floor - Fireproofing	9%
11	2nd Floor - Fireproofing	9%
12	3rd Floor - Fireproofing	8%
13	3rd Floor - Fireproofing	9%
14	3rd Floor - Fireproofing	6%
15	Chiller Building - Elbows	0%
16	4th Floor - Fireproofing	5%
17	4th Floor - Fireproofing	6%
18	4th Floor - Fireproofing	6%

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July 18, 1986

PIS 00006662

LOCATION OF ASBESTOS MATERIAL

<u>AREA</u>	<u>TYPE</u>	<u>LOCATION</u>
Basement, Floors 1 - 4	Fireproofing	Throughout Floors
Chiller Mech Room	Pipe Elbows	Piping
Ground Level	Transite	Cooling Tower

Building 2635VISUAL OBSERVATION

The only friable material observed in this building was a friable exhaust muffler coating leading from the generator to the chiller room.

BULK SAMPLING RESULTS

<u>SAMPLE NO.</u>	<u>LOCATION</u>	<u>RESULTS</u>
01	Basement - Generator Exhaust Insulation	0%

LOCATION OF ASBESTOS MATERIAL

No asbestos materials were observed within Building 2635.

BUILDINGS 1740, 1750, 1760, 1770, 1780, 1790

VISUAL OBSERVATION

Transite towers were observed on the fascia, soffits and wall boards of this group of buildings.

BULK SAMPLING RESULTS

<u>SAMPLE NO.</u>	<u>LOCATION</u>	<u>RESULTS</u>
01	Floor Tile - #1770	0%

LOCATION OF ASBESTOS MATERIAL

Transite asbestos panels were observed on the exterior of the building. The panels were found in the following areas:

- #1790 - Sides and Eaves
- #1760 - Sides and Eaves
- #1780 - Eaves Only
- #1770 - Sides and Eaves
- #1750 - Sides and Eaves
- #1740 - Eaves Only

July 18, 1986

BUILDINGS 1900, 1901, 1925, 1950, 1975

VISUAL OBSERVATION

Friable pipe elbows were observed in the mechanical rooms of Buildings 1900 and 1950.

BULK SAMPLING RESULTS

<u>SAMPLE NO.</u>	<u>LOCATION</u>	<u>RESULTS</u>
01	Mechanical Room Bldg. 1900 Elbows	3%
02	Mechanical Room Bldg. 1950 Elbows	5%

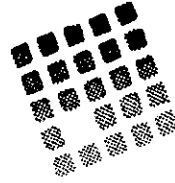
LOCATION OF ASBESTOS MATERIAL

Pipe elbows in all Mechanical Rooms in Buildings 1900 and 1950

C-10

July 18, 1986

P18 00006665



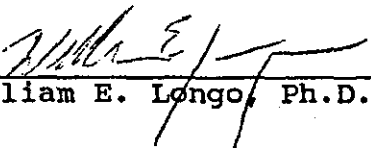
MATERIALS
ANALYTICAL
SERVICES

June 27, 1990

Re: Century Center I
Atlanta, Georgia

Based on the constituent analysis of the fireproofing samples for the above-referenced project, it is my opinion that the samples analyzed are Mono-Kote 3, which was manufactured by W. R. Grace.

Worksheets reflecting our analysis are attached.


William E. Longo, Ph.D.

PIS 00060565

3597 Parkway Lane • Suite 250
Norcross, Georgia 30092
(404) 448-3200 FAX (404) 368-8256

BUILDING: Century Center I
Atlanta, Georgia

The following bulk samples from the above-referenced buildings were analyzed and were used to form an opinion of the manufacturer and product.

<u>Bulk Sample #</u>	<u>Sample Location</u>	<u>Collected By</u>
1	10th Floor Bath	McCrone
3	8th Floor	McCrone
4	7th Floor	McCrone
5	6th Floor	McCrone
6	5th Floor	McCrone
7	4th Floor, West Hall	McCrone
8	3rd Floor	McCrone
9	2nd Floor	McCrone
10	1st Floor	McCrone
11	Ground Floor	McCrone

MATERIALS ANALYTICAL SERVICES, INC.

BULK ANALYSIS SHEET

Project # - Spl #: M1565-1Date: 9/23/88Project Name: LAW ASSOCIATES/HATFIELDAnalyst: W.B.?
Reviewer: _____Sample Identification: A88-120.18 CENTURY CENTER COMPLEX, 2200 BUILDING.
10TH FLOOR BATH.Gross Visual Description: TAN TO LIGHT GRAY MATRIX WITH GOLD FLAKES
THROUGHOUT. FINE FIBERS EXPOSED.

ASBESTOS MINERALS:

Est. Vol. %

Chrysotile	<u>9</u>
Amosite	_____
Crocidolite	_____
Tremolite/Actinolite	_____
Anthophyllite	_____

OTHER FIBROUS COMPONENTS:

Mineral/Rock wool	_____
Fibrous glass	_____
Cellulose	<u>TR</u>
Synthetic	_____
Talc	_____

NON-FIBROUS COMPONENTS:

Perlite	_____
Vermiculite	<u>39</u>
Mica	_____
Quartz	_____
Calcite	_____
Gypsum	_____
Diatoms	_____
Other GRANULAR MINERALS	<u>TR</u>

Binders 52PREDOMINANTLY GYPSUM. SMALL AMOUNTS OF CARBONATE.EFFERVESCENCE: VERY WEAK

COMMENTS:

IODINE STARCH TEST NEGATIVE ORANGE COLOR.

MATERIALS ANALYTICAL SERVICES, INC.

BULK ANALYSIS SHEET

Project # - Spl #: M1565-3Date: 9/23/81Project Name: LAW ASSOCIATES/HATFIELDAnalyst: W.B.E.
Reviewer: _____Sample Identification: A81-120.18 #3 FROM 2200 BUILDING OF CENTURY
CENTER COMPLEX, 8TH FLOOR, SW. QUADRANT.Gross Visual Description: TAN TO LIGHT GRAY MATRIX WITH GOLD FLAKES.
FINE FIBERS EXPOSED.

ASBESTOS MINERALS:

Est. Vol. %

Chrysotile	<u>8</u>
Amosite	_____
Crocidolite	_____
Tremolite/Actinolite	_____
Anthophyllite	_____

OTHER FIBROUS COMPONENTS:

Mineral/Rock wool	_____
Fibrous glass	_____
Cellulose	_____
Synthetic	_____
Talc	_____

NON-FIBROUS COMPONENTS:

Perlite	_____
Vermiculite	<u>40</u>
Mica	_____
Quartz	_____
Calcite	_____
Gypsum	_____
Diatoms	_____
Other GRANULAR MINERALS	<u>TR</u>

Binders	<u>52</u>
-------------------	-----------

GYPSUM PREDOMINATES, SMALL AMOUNT OF CARBONATE.

EFFERVESCENCE: VERY WEAK IN ISOLATED AREAS.COMMENTS:

MATERIALS ANALYTICAL SERVICES, INC.

BULK ANALYSIS SHEET

Project # - Spl #: M1565-4Date: 9/23/88Project Name: LAW ASSOCIATES/HATFIELDAnalyst: W.D.E.
Reviewer: _____Sample Identification: APP-120.18 #4 FROM 2200 BUILDING OF CENTURY
CENTER COMPLEX. 7TH FLOOR NE. QUADRANTGross Visual Description: TAN TO LIGHT GRAY WITH GOLD FLAKES THROUGHOUT.
FINE FIBERS EXPOSED.

ASBESTOS MINERALS:

Est. Vol. %

Chrysotile	<u>8</u>
Amosite	_____
Crocidolite	_____
Tremolite/Actinolite	_____
Anthophyllite	_____

OTHER FIBROUS COMPONENTS:

Mineral/Rock wool	_____
Fibrous glass	_____
Cellulose	_____
Synthetic	_____
Talc	_____

NON-FIBROUS COMPONENTS:

Perlite	_____
Vermiculite	<u>33</u>
Mica	_____
Quartz	_____
Calcite	_____
Gypsum	_____
Diatoms	_____
Other GRANULAR MINERALS	<u>TR</u>

Binders	<u>59</u>
-------------------	-----------

GYPSON DOMINANT. SMALL AMOUNT OF CARBONATE.

EFFERVESCENCE; VERY WEAKCOMMENTS:

MATERIALS ANALYTICAL SERVICES, INC.

BULK ANALYSIS SHEET

Project # - Spl #: M1565-5Date: 9/23/88Project Name: LAW ASSOCIATES/HATFIELDAnalyst: V.B.E.
Reviewer: _____Sample Identification: A88-126.18 #5 FROM 2200 BUILDING OF CENTURY CENTER COMPLEX 6TH FLOOR N.W. QUADRANTGross Visual Description: TANNISH LIGHT GRAY WITH GOLD FLAKES THROUGHOUT THE MATRIX. FIBERS EXPOSED.

ASBESTOS MINERALS:


Est. Vol. %

Chrysotile	9
Amosite	_____
Crocidolite	_____
Tremolite/Actinolite	_____
Anthophyllite	_____

OTHER FIBROUS COMPONENTS:

Mineral/Rock wool	_____
Fibrous glass	_____
Cellulose	_____
Synthetic	_____
Talc	_____

NON-FIBROUS COMPONENTS:

Perlite	_____
Vermiculite	35
Mica	_____
Quartz	_____
Calcite	_____
Gypsum	_____
Diatoms	_____
Other 	_____

Binders 56
ABUNDANT GYPSUM, SLIGHT AMOUNT OF CARBONATEEFFERVESCENCE: VERY WEAKCOMMENTS:

MATERIALS ANALYTICAL SERVICES, INC.

BULK ANALYSIS SHEET

Project # - Spl #: M1565-6Date: 9/23/84Project Name: LAW ASSOCIATES/HATFIELDAnalyst: N.B.E.
Reviewer: _____Sample Identification: A88-120.18 #6 FROM 2200 BUILDING OF CENTURY
CENTER COMPLEX 5TH FLOOR, N.W. QUADRANT.Gross Visual Description: LIGHT GRAY TO TAN WITH SMALL GOLD FLAKES
THROUGHOUT. FIBERS EXPOSED.

ASBESTOS MINERALS:

Est. Vol. %

Chrysotile	8
Amosite	
Crocidolite	
Tremolite/Actinolite	
Anthophyllite	

OTHER FIBROUS COMPONENTS:

Mineral/Rock wool	
Fibrous glass	
Cellulose	
Synthetic	
Talc	

NON-FIBROUS COMPONENTS:

Perlite	
Vermiculite	33
Mica	
Quartz	
Calcite	
Gypsum	
Diatoms	
Other	

Binders 59
ABUNDANT GYPSUM, SMALL CARBONATE AMOUNT.EFFERVESCENCE; VERY WEAKCOMMENTS:

MATERIALS ANALYTICAL SERVICES, INC.

BULK ANALYSIS SHEET

Project # - Spl #: 141565-7Date: 9/23/88Project Name: LAW ASSOCIATES/HATFIELDAnalyst: W.B.E.
Reviewer: _____Sample Identification: A88-120.18 #7 FROM 2200 BUILDING OF
CENTURY CENTER COMPLEX, 4TH FLOOR, WEST HALL.Gross Visual Description: TAN TO LIGHT GRAY, WITH GOLD FLAKES
THROUGHOUT. FIBERS EXPOSED.

ASBESTOS MINERALS:

Est. Vol. %

Chrysotile	<u>8</u>
Amosite	_____
Crocidolite	_____
Tremolite/Actinolite	_____
Anthophyllite	_____

OTHER FIBROUS COMPONENTS:

Mineral/Rock wool	_____
Fibrous glass	_____
Cellulose	_____
Synthetic	_____
Talc	_____

NON-FIBROUS COMPONENTS:

Perlite	_____
Vermiculite	<u>40</u>
Mica	_____
Quartz	_____
Calcite	_____
Gypsum	_____
Diatoms	_____
Other	_____

Binders 52
GYPSON IS VERY ABUNDANT. SOME CARBONATE PRESENT.EFFERVESCENCE; VERY WEAKCOMMENTS:

MATERIALS ANALYTICAL SERVICES, INC.

BULK ANALYSIS SHEET

Project # - Spl #: M1565-8Date: 9/28/88Project Name: LAW ASSOCIATES/HATFIELDAnalyst: W. D. E.
Reviewer: _____Sample Identification: APP-120.18 #8 FROM 2200 BUILDING OF
CENTURY CENTER COMPLEX. 3RD FLOOR S.W. QUADRANT.Gross Visual Description: LIGHT GRAY WITH GOLD FLAKES. FIBERS EXPOSED
FROM MATRIX.

ASBESTOS MINERALS:

Est. Vol. %

Chrysotile	9
Amosite	_____
Crocidolite	_____
Tremolite/Actinolite	_____
Anthophyllite	_____

OTHER FIBROUS COMPONENTS:

Mineral/Rock wool	_____
Fibrous glass	_____
Cellulose	_____
Synthetic	_____
Talc	_____

NON-FIBROUS COMPONENTS:

Perlite	_____
Vermiculite	40
Mica	_____
Quartz	_____
Calcite	_____
Gypsum	_____
Diatoms	_____
Other	_____

Binders 51

PREDOMINANTLY GYPSUM, SMALL CARBONATE PERCENTAGE, TRACE OF OTHER GRANULAR MINERALSEFFERVESCENCE: VERY WEAKCOMMENTS:

MATERIALS ANALYTICAL SERVICES, INC.

BULK ANALYSIS SHEET

Project # - Spl #: M1565-9Date: 7/26/88Project Name: LAW ASSOCIATES/HATFIELDAnalyst: W.B.E.
Reviewer: _____Sample Identification: A88-120.18 #9 FROM 2200 BUILDING OF CENTURY
CENTER COMPLEX. 2ND FLOOR ABOVE LADIES ROOM.Gross Visual Description: TAN TO LIGHT GRAY MATRIX WITH GOLD FLAKES
THROUGHOUT. FINE FIBERS EXPOSED.

ASBESTOS MINERALS:

Est. Vol. %

Chrysotile	<u>7</u>
Amosite	_____
Crocidolite	_____
Tremolite/Actinolite	_____
Anthophyllite	_____

OTHER FIBROUS COMPONENTS:

Mineral/Rock wool	_____
Fibrous glass	_____
Cellulose	_____
Synthetic	_____
Talc	_____

NON-FIBROUS COMPONENTS:

Perlite	_____
Vermiculite	<u>38</u>
Mica	_____
Quartz	_____
Calcite	_____
Gypsum	_____
Diatoms	_____
Other	_____

Binders 55PREDOMINANTLY GYPSUM, SOME CARBONATE PRESENT IN SMALL AMOUNTSEFFERVESCENCE: VERY WEAK

COMMENTS:

MATERIALS ANALYTICAL SERVICES, INC.

BULK ANALYSIS SHEET

Project # - Spl #: 171565-10Date: 9/26/88Project Name: LAW ASSOCIATES/HATFIELDAnalyst: N. D. S.
Reviewer: _____Sample Identification: A88-120.18 H10 FROM BUILDING 2200 IN CENTURY CENTER COMPLEX, 1ST FLOOR ABOVE LADIES RESTROOM.Gross Visual Description: TAN TO LIGHT GRAY MATRIX WITH GOLD FLAKES THROUGHOUT. FIBERS EXPOSED FROM MATRIX.

ASBESTOS MINERALS:

Est. Vol. %

Chrysotile	8
Amosite	_____
Crocidolite	_____
Tremolite/Actinolite	_____
Anthophyllite	_____

OTHER FIBROUS COMPONENTS:

Mineral/Rock wool	_____
Fibrous glass	_____
Cellulose	_____
Synthetic	_____
Talc	_____

NON-FIBROUS COMPONENTS:

Perlite	_____
Vermiculite	39
Mica	_____
Quartz	_____
Calcite	_____
Gypsum	_____
Diatoms	_____
Other	_____

Binders : 53

GYP SUM PREDOMINATES, CARBONATE PRESENT IN SMALL AMOUNT, GRANULAR MINERALS.EFFERVESCENCE: VERY WEAK

COMMENTS:

MATERIALS ANALYTICAL SERVICES, INC.

BULK ANALYSIS SHEET

Project # - Spl #: M1565-11Date: 9/26/11Project Name: LAW ASSOCIATES/HATFIELDAnalyst: H.B.S.
Reviewer: _____Sample Identification: A88-120.18 #11 FROM 2200 BUILDING OF
CENTURY CENTER COMPLEX. ~~25 FLOOR~~ GROUND FLOOR, NORTHEAST QUADRANTGross Visual Description: LIGHT GRAY TO TAN MATRIX WITH GOLD FLAKES
THROUGHOUT. FINE FIBERS EXPOSED.

ASBESTOS MINERALS:

Est. Vol. %

Chrysotile	<u>7</u>
Amosite	_____
Crocidolite	_____
Tremolite/Actinolite	_____
Anthophyllite	_____

OTHER FIBROUS COMPONENTS:

Mineral/Rock wool	_____
Fibrous glass	_____
Cellulose	_____
Synthetic	_____
Talc	_____

NON-FIBROUS COMPONENTS:

Perlite	_____
Vermiculite	<u>35</u>
Mica	_____
Quartz	_____
Calcite	_____
Gypsum	_____
Diatoms	_____
Other	_____

Binders 58
GYP SUM PREDOMINATES, CARBONATE PRESENT IN SMALL PERCENTAGEEFFERVESCENCE: VERY WEAKCOMMENTS:

M.A.S.
3597 PARKWAY LANE
NORCROSS GA. 30092

ACID DISSOLUTION BULK ANALYSIS

ANALYSIS USING 2% SOLUTION HCl

DATE

W.B. Spelman

No.	SAMPLE #	P-D + SAMPLE	P-D - SAMPLE	SAMPLE WEIGHT	FILTER WEIGHT	FINAL WT + FILTER	FINAL WT - FILTER	PERCENT FINAL WT	AMOUNT IN SOLU.
1	41565-1	8.8088g	7.6894g	1.1194g	0.0151g	0.4719g	0.4568g	40.8%	54.2%
2									
3									
4									
5									
6									
7									
8									
9									
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PIS 00060577

MATERIALS ANALYTICAL SERVICES, INC.
 3597 PARKWAY LANE, SUITE 250
 NORCROSS, GA 30092
 404/448-3200

TEM ANALYSIS: Binder PROJECT: A88-120.18 DATE OF ANALYSIS: 11-25-88
 HAS SAMPLE ID: M-1565-1 SAMPLE NUMBER: Century Tower ANALYST: WCF

Rel. Conc.	Morphology	Photo	SAED	Photo	EDS	Disc/File	Comments
Asbestos Minerals:							
Chrysotile	✓		✓		✓		Printout
Other Components:							
Gypsum	✓		✓		✓		Printout
Vermiculite	✓		✓	photo	✓		Printout
				20-50cm			

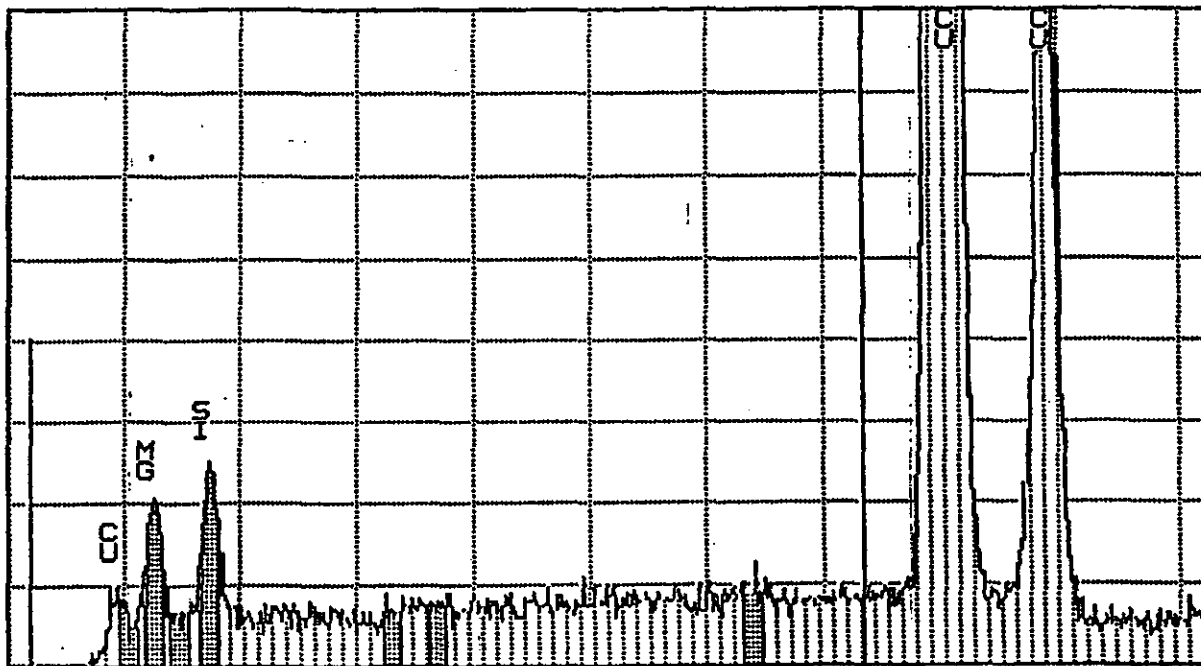
COMMENTS:

MATERIALS ANALYTICAL SERVICES

FRI 25-NOV-88 09:54

Cursor: 7.340keV = 43

ROI (SIK α) 1.660: 1.820=1013



0.000

B-5

VFS = 512

10.240

39

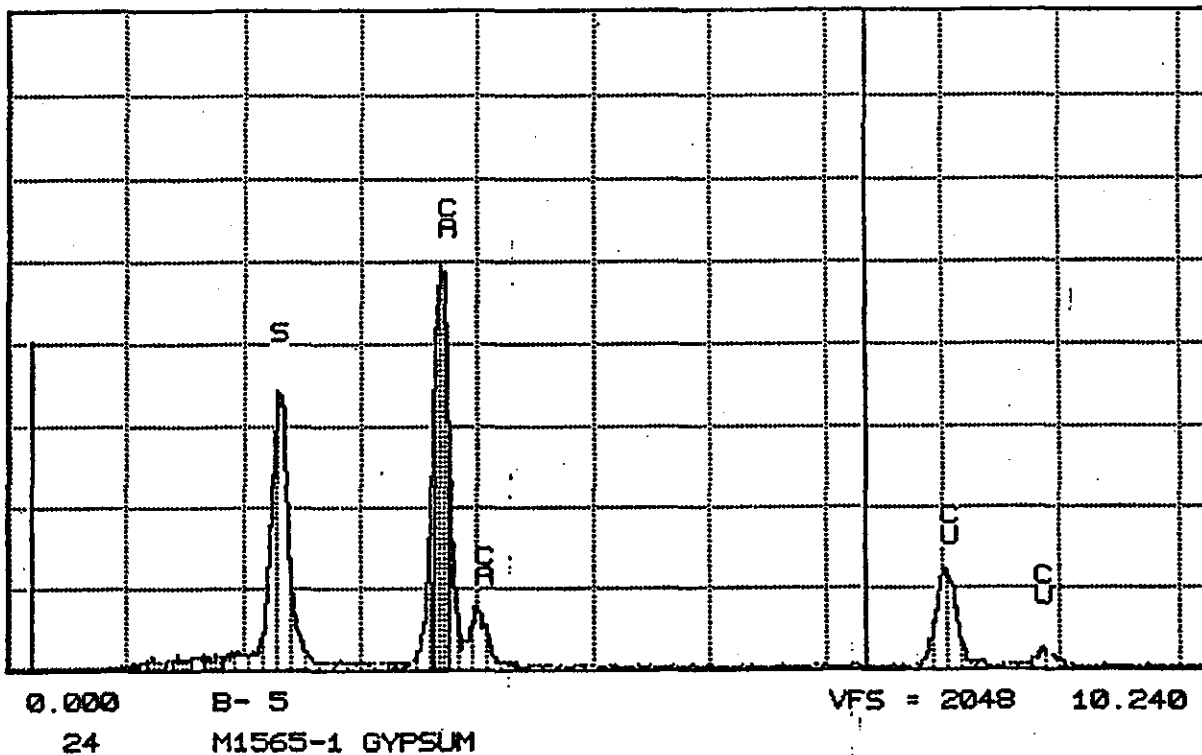
M1565-1 CHRYSOTILE

MATERIALS ANALYTICAL SERVICES

FRI 25-NOV-88 10:00

Cursor: 7.340KeV = 15

ROI (SIK α) 1.660: 1.820=323



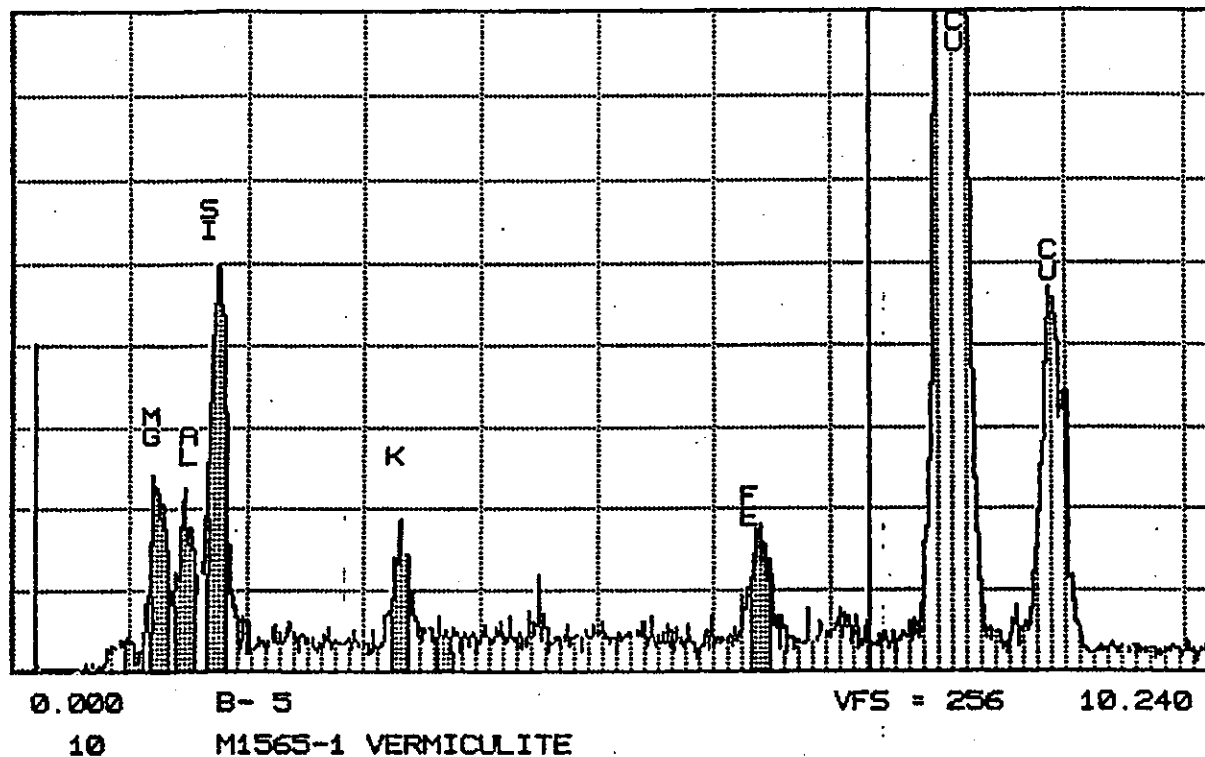
PIS 00060580

MATERIALS ANALYTICAL SERVICES

FRI 25-NOV-88 10:14

Cursor: 7.340keV = 19

ROI (SIK α) 1.660: 1.820=1016



PIS 00060581



MATERIALS
ANALYTICAL
SERVICES

ADDITIONAL BULK ANALYSIS

STARCH VERIFICATION

Sample # M1565-1

Analyst W.B. Egan

Date 6/26/90

1) Sample Analyzed before/after acid dissolutions

Starch observed

no ✓

yes _____

Iodine test
(ceiling tile only)

positive _____

negative _____

PIS 00060582

3597 Parkway Lane • Suite 250
Norcross, Georgia 30092
(404) 448-3200

D
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EXHIBIT C

2600 CENTURY CENTER

ATLANTA, GA

(W.R. GRACE)

**SUMMARY OF ASBESTOS
FIREPROOFING MANAGEMENT,
REMOVAL AND REPLACEMENT NET COSTS**

Prepared By

Halliwell Engineering Associates, Inc.

July, 1996

**2600 CENTURY CENTER
ATLANTA, GA
(W.R. GRACE)**

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**2600 CENTURY CENTER
ATLANTA, GA
(W.R. GRACE)**

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**2600 CENTURY CENTER
ATLANTA, GA
(W.R. GRACE)**

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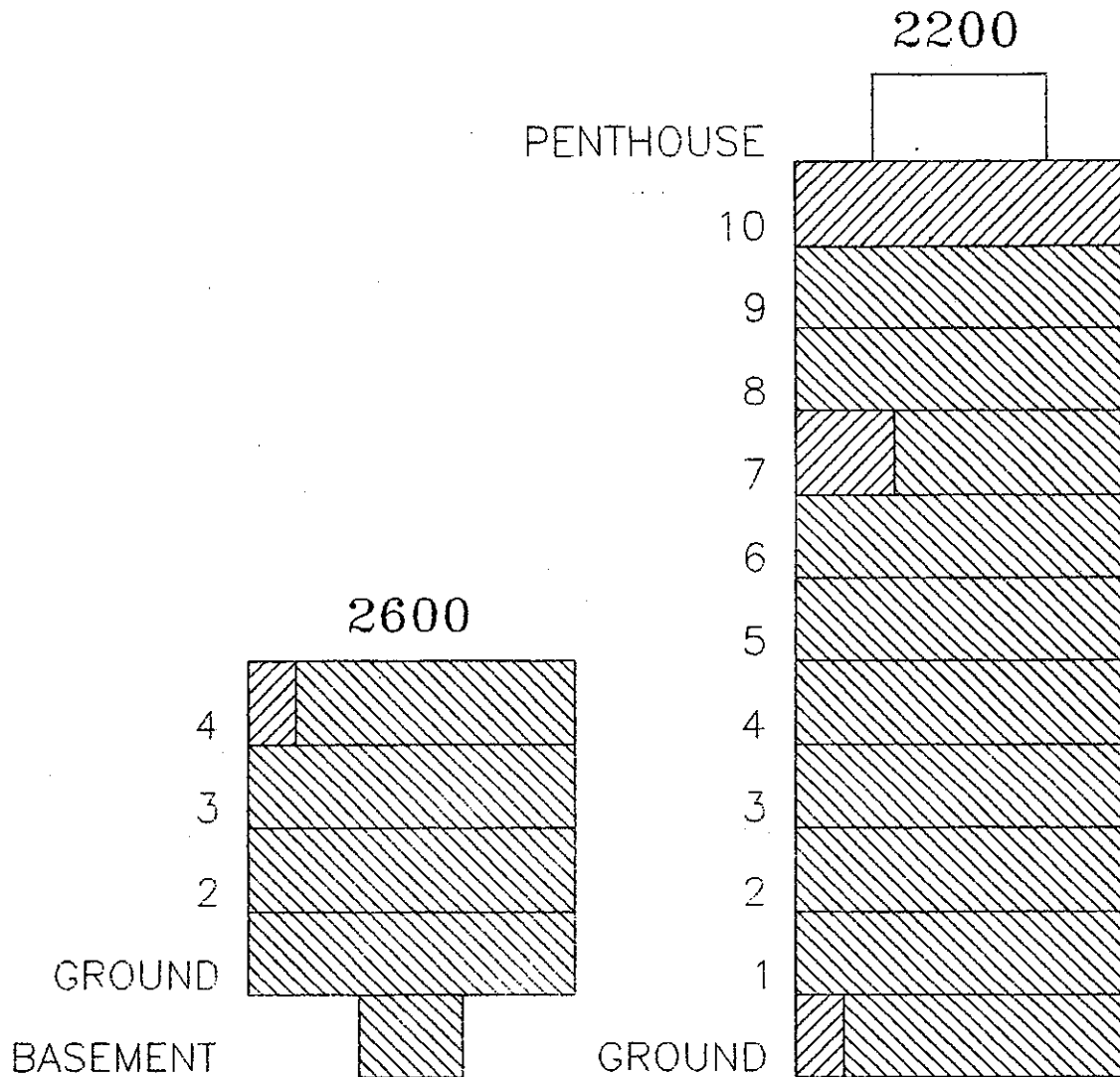
SECTION I

SECTION I



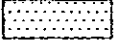
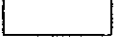
INTRODUCTION

B. ASBESTOS FIREPROOFING REMOVAL STATUS DRAWING

CENTURY CENTER
ATLANTA, GEORGIA



LEGEND:

-  FIREPROOFING REMOVED PRIOR TO SALE
-  FIREPROOFING REMOVED AFTER SALE
-  FIREPROOFING REMAINS
-  FIREPROOFING NEVER APPLIED

A) BUILDING EXTERIOR PHOTOGRAPH



**2600 Century Center
Atlanta, Georgia**

C. BUILDING INFORMATION SUMMARY

Building name: 2600 Century Center

Location: Atlanta, Georgia

Ownership: Building sold by The Prudential Insurance Company of America (9/1/88)

Building use: Multi-tenant commercial offices

Total number of floors: 4-1/2; ground through 4th floor plus partial basement

Number of floors with spray-applied fireproofing: 4-1/2; ground through 4th plus partial basement

Total floor area with fireproofing: 109,807 sq. ft.

Location of fireproofing: Beams and columns

Type of deck: Corrugated steel

Core area: Entire core area is sprayed, including the elevator shafts and stairwells

Fireproofing surface area on a typical office floor: 29,243.68 sq. ft.

Fireproofing surface area to floor area ratio (typical floor): $29,243.68 \div 27,268 = 1.07$

Type of HVAC system: One mechanical room on each floor. Multi-zone constant volume system for both the perimeter and interior system, with perimeter ceiling mounted slot diffusers. Ductwork consists of a hot deck and cold deck system, with cooling and heating coils within the main HVAC unit located in the mechanical room. The ceiling space is an open return air plenum which returns to the mechanical room, which is also a return air plenum.

D. INFORMATION CONSIDERED IN THE DEVELOPMENT OF THIS REPORT

1. Building Information:

Building design drawings
Asbestos survey
Correspondence
Building inspections
Photographs and photo logs
Discussions with building personnel

2. Asbestos Abatement Cost Information:

Contract documents
Contractor's applications for payment

3. Asbestos Abatement Project Information:

Federal and state asbestos regulations

4. Removal Fund Information:

Asbestos removal estimates
Proposed sale structure
Agreement for Purchase and Sale
Survey
Removal Fund Allocation requests